

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA, ) Criminal No. 18-150(1) (DWF/HB)  
                                  )  
                                  Plaintiff, )  
                                  )  
                                  v. ) **DEFENDANT'S MOTION FOR**  
MICHAEL HARI,              ) **CONTINUANCE OF TRIAL**  
                                  )  
                                  Defendant. )

Michael Hari, by and through his attorneys, Shannon Elkins and James Becker, hereby respectfully moves the Court for a continuance of trial in this case.

On August 28, 2019, Michael Hari was appointed new counsel, who had not reviewed any of the discovery provided by the government since last February. This discovery is voluminous, includes approximately 30,000 pages of law enforcement reports, search warrant returns, photographs and other information related to this case and a pending case in Illinois. None of it is organized. Thus, counsel needs ample time to review and organize the discovery to prepare adequately for trial. The defense has communicated with the government regarding these circumstances and the government does not oppose this request.

Initially, the Court proposed a trial date of January 6, 2020, meaning that counsel for Mr. Hari would receive another batch of discovery, including Jencks materials, expert notices and other information near the end of December, when counsel will be traveling for the holidays. Due to this timing and the appointment of new counsel, Mr. Hari

respectfully requests additional time for his attorneys to adequately review the discovery in the case and to prepare for trial.

Pursuant to this motion, Mr. Hari also moves to exclude a 60-day period of time from the Speedy Trial Act computations, pursuant to 18 U.S.C. § 3161 (h)(7)(A). The grounds for this motion are set forth in the accompanying Statement of Facts in Support of Exclusion of Time Under Speedy Trial Act. A proposed order accompanies this motion, which is based on all files, records, proceedings herein.

Dated: September 26, 2019

Respectfully submitted,

*s/Shannon Elkins*

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